

UNITED STATES OF AMERICA  
Plaintiff,  
v.  
JAN H. FICHMAN,  
[DOB: 3/22/1952]  
ANITA M. FICHMAN,  
[DOB: 11/11/1952]  
and  
ADAM GEOFFREY'S INC.,  
d/b/a 7<sup>th</sup> HEAVEN STORES  
Defendants.

)  
)  
) Case No. \_\_\_\_\_  
)  
) COUNT ONE:  
) 21 U.S.C. § 863(a)(1), (b) and  
) 846  
) NMT 3 Years Imprisonment  
) NMT \$250,000 Fine  
) NLT 1 Year Supervised Release  
) Class E Felony  
)  
) COUNT TWO:  
) 21 U.S.C. § 863(a)(1) and (b)  
) and 18 U.S.C. § 2  
) NMT 3 Years Imprisonment  
) NMT \$250,000 Fine  
) NLT 1 Year Supervised Release  
) Class E Felony  
)  
) COUNT THREE:  
) 21 U.S.C. § 863(a)(1) and (b)  
) and 18 U.S.C. § 2  
) NMT 3 Years Imprisonment  
) NMT \$250,000 Fine  
) NLT 1 Year Supervised Release  
) Class E Felony  
)  
) COUNT FOUR:  
) 21 U.S.C. § 863(a)(1) and (b)  
) and 18 U.S.C. § 2  
) NMT 3 Years Imprisonment  
) NMT \$250,000 Fine  
) NLT 1 Year Supervised Release  
) Class E Felony  
)  
) COUNT FIVE:  
) 21 U.S.C. § 863(a)(1) and (b)  
) and 18 U.S.C. § 2  
) NMT 3 Years Imprisonment  
) NMT \$ 250,000 Fine  
) NLT 1 Year Supervised Release  
) Class E Felony

) COUNT SIX:  
) Criminal Forfeiture  
) 21 U.S.C. § 853  
)  
) \$100 Mandatory Special  
) Assessment for Counts One  
) through Five

**I N D I C T M E N T**

THE GRAND JURY CHARGES:

**COUNT ONE**

That from on or about January 1, 2000, to the present, said dates being approximate, in the Western District of Missouri, JAN H. FICHMAN, ANITA M. FICHMAN, and ADAM GEOFFREY'S INC. d/b/a 7<sup>th</sup> Heaven Stores, defendants herein, did conspire with each other and others both known and unknown to the grand jury to sell and offer for sale drug paraphernalia, as that term is defined in Title 21, United States Code, Section 863(d) and encompassed by Title 21, United States Code, Section 863(e), contrary to the provisions of Title 21, United States Code, Sections 863(a) (1) and 863(b), all in violation of Title 21, United States Code, Section 846

**COUNT TWO**

That on or about October 21, 2003, in the Western District of Missouri, JAN H. FICHMAN, ANITA M. FICHMAN, and ADAM GEOFFREY'S INC. d/b/a 7<sup>th</sup> Heaven Stores, defendants herein, aiding and abetting each other and others both known and unknown to the grand jury, did sell and offer for sale drug

paraphernalia, as that term is defined in Title 21, United States Code, Section 863(d) and encompassed by Title 21, United States Code, Section 863(e), contrary to the provisions of Title 21, United States Code, Sections 863(a)(1) and 863(b); and Title 18, United States Code, Section 2

**COUNT THREE**

That on or about October 22, 2003, in the Western District of Missouri, JAN H. FICHMAN, ANITA M. FICHMAN, and ADAM GEOFFREY'S, INC. d/b/a 7<sup>th</sup> Heaven Stores, defendants herein, aiding and abetting each other and others both known and unknown to the grand jury, did sell and offer for sale drug paraphernalia, as that term is defined in Title 21, United States Code, Section 863(d) and encompassed by Title 21, United States Code, Section 863(e), contrary to the provisions of Title 21, United States Code, Sections 863(a)(1) and 863(b); and Title 18, United States Code, Section 2.

**COUNT FOUR**

That on or about January 8, 2004, in the Western District of Missouri, JAN H. FICHMAN, ANITA M. FICHMAN, and ADAM GEOFFREY'S, INC. d/b/a 7<sup>th</sup> Heaven Stores, defendants herein, aiding and abetting each other and others both known and unknown to the grand jury, did sell and offer for sale drug paraphernalia, as that term is defined in Title 21, United States Code, Section 863(d) and encompassed by Title 21, United States Code, Section

863(e), contrary to the provisions of Title 21, United States Code, Sections 863(a)(1) and 863(b); and Title 18, United States Code, Section 2

**COUNT FIVE**

That on or about May 19, 2004, in the Western District of Missouri, JAN H. FICHMAN, ANITA M. FICHMAN, and ADAM GEOFFREY'S INC. d/b/a 7<sup>th</sup> Heaven Stores, defendants herein, aiding and abetting each other and others both known and unknown to the grand jury, did sell and offer for sale drug paraphernalia, as that term is defined in Title 21, United States Code, Section 863(d) and encompassed by Title 21, United States Code, Section 863(e), contrary to the provisions of Title 21, United States Code, Sections 863(a)(1) and 863(b); and Title 18, United States Code, Section 2.

**COUNT SIX**

1. The Grand Jury realleges and incorporates by reference the allegations contained in Counts One through Five of this Indictment for the purpose of alleging criminal forfeitures pursuant to Title 21, United States Code, Sections 853(a)(1), 853(a)(2), 853(p) and 863(c).

2. As a result of the commission of the violations charged in Counts One through Five of this Indictment, the defendants, JAN H. FICHMAN, ANITA M. FICHMAN, and ADAM GEOFFREY'S INC. d/b/a 7<sup>th</sup> Heaven Stores, did acquire the following property, which

constitutes, and is derived from, the proceeds obtained, directly and indirectly, from said violations, thereby subjecting the property to forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853(a)(1):

- (a) United States currency in the amount of \$3,120,330, constituting the proceeds of said violations.

3. In commission of the violations charged in Counts One through Five of this Indictment, the defendants, JAN H. FICHMAN, ANITA M. FICHMAN, and ADAM GEOFFREY'S INC. d/b/a 7<sup>th</sup> Heaven Stores, used the following property to commit, and to facilitate the commission of, said violations, thereby subjecting the property to forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853(a)(2):

- (a) real property described as All of Lot 329 and W 10 ft. Lot 330 Marlborough Heights, and known and numbered as 7621 Troost Avenue, Kansas City, Missouri.
- (b) real property described as Hallbrook Farms 2<sup>nd</sup> Plat, Lot 2, Block 3 and known and numbered as 2504 West 114<sup>th</sup> Street, Leawood, Kansas, 66209.

4. In commission of the violations charged in Counts One through Three of this Indictment, the defendants, JAN H. FICHMAN, ANITA M. FICHMAN, and ADAM GEOFFREY'S INC. d/b/a 7<sup>th</sup> Heaven Stores, involved the following property in said violations, thereby subjecting the property to forfeiture to the United States of America pursuant to Title 21, United States Code, Section 863(c):

- (a) drug paraphernalia currently possessed at 7621 Troost Avenue, Kansas City, Missouri.
- (b) drug paraphernalia currently possessed at 1001 Limit Street, Sedalia, Missouri.
- (c) drug paraphernalia currently possessed at 1000 Massachusetts, Lawrence, Kansas.
- (d) drug paraphernalia purchased by law enforcement officials during undercover purchases on October 21, 2003, October 22, 2003, and January 8, 2004, and drug paraphernalia possessed on May 19, 2004.

5. If through any act or omission by the defendants, JAN H. FICHMAN, ANITA M. FICHMAN, and ADAM GEOFFREY'S INC. d/b/a 7<sup>th</sup> Heaven Stores, any or all of the property described in paragraphs two through four above (hereinafter the Subject Properties),

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

The United States intends to seek forfeiture of any other property of the defendants up to the value of the Subject Properties forfeitable above pursuant to Title 21, United States Code, Section 853(p) including but not limited to the following:

- (a) 7609 Troost Ave, Kansas City, MO. Legal: South 100 ft. Lot 328 Marlborough Heights, and personal and business property located therein;

- (b) 7601 Troost Ave, Kansas City, MO. Legal: North 60 ft. Lot 328 Marlborough Heights, and personal and business property located therein;
- (c) 1114 E. 76<sup>th</sup> St, Kansas City, MO. Legal: West 24ft Lot 282 Marlborough Heights, and personal and business property located therein;
- (d) 5600 Independence Ave, Kansas City, MO. Legal: Lots 25, 26, 27 and 28, Block 7, Maplewood, and personal and business property located therein; and
- (e) 4835 Independence Ave, Kansas City, MO. Legal: Tract 1: West 23, 25 ft of North 136.05 ft. of Lot 1, except that part thereof in Independence Ave, Bloomfield Addition. Tract 2: All of Lots 1, 2, 3, 4, 5 and the East 40 Ft of Lot 6 Block b except that part in Independence Ave, Bloomfield Addition, and personal and business property located therein.
- (f) real property described as Hallbrook Farms 2<sup>nd</sup> Plat, Lot 2, Block 3 and known and numbered as 2504 West 114<sup>th</sup> Street, Leawood, Kansas, 66209 and personal property located therein at 2504 West 114<sup>th</sup> Street Leawood, Kansas 66209.

A TRUE BILL.

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FOREPERSON OF THE GRAND JURY

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Catherine Connelly # 39018  
Assistant United States Attorney

Dated: \_\_\_\_\_  
Kansas City, Missouri